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ILLINOIS COMMERCE COMMISSION

Before the
ILLINOIS COMMERCE COMMISSION
Springfield, Illinois 62701

ILLINOIS
COMMERCE COMMISSION
OCT 19 11 05 AM '01

NeuStar, Inc., in its role as North American
Numbering Plan Administrator

Petition for Approval of Numbering Plan
Area Relief Planning for the 217 NPA

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ICC Docket No.

CHIEF CLERK'S OFFICE

01-0656

**PETITION OF THE
NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR
ON BEHALF OF THE
ILLINOIS TELECOMMUNICATIONS INDUSTRY**

NeuStar, Inc., the North American Numbering Plan Administrator ("NANPA"), in its role as the neutral third party NPA Relief Planner for Illinois under the North American Numbering Plan and on behalf of the Illinois telecommunications industry ("Industry"),¹ petitions the Illinois Commerce Commission ("Commission")² to approve the Industry's consensus decision to recommend to the Commission an all services distributed overlay of the 217 numbering plan area ("NPA") as its first choice for relief of the 217 NPA.³ The Industry reached consensus to recommend a geographic split running north to south through the

¹ The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 217 area code of Illinois.

² The Federal Communications Commission ("FCC") delegated authority to review and approve NPA relief plans to the states. See 47 C.F.R. § 52.19 (1999).

³ As the neutral third party administrator, NANPA has no independent view regarding the relief option selected by the Industry.

midsection of the 217 NPA as its second choice for relief.⁴ The Industry submits its recommendations to the Commission based upon NANPA's projections that absent NPA relief, the supply of central office codes (often referred to as "CO" or "NXX" codes) for the 217 NPA will exhaust during the second quarter of 2004. In order to allow sufficient time for completion of the selected relief plans prior to exhaust of CO codes in the 217 NPA, the Industry recommends that the Commission approve its recommended 19-month implementation schedule if the Commission adopts the overlay alternative or its 21-month implementation schedule if the Commission adopts the recommended split alternative. In support of this petition and on behalf of the Industry, NANPA submits the following:

I. BACKGROUND

The 2001 NRUF (Number Resource Utilization Forecast) and NPA Exhaust Analysis June 1, 2001 Update ("2001 NRUF Report") indicates that the 217 NPA will exhaust during the second quarter of 2004.⁵ Due to the projected exhaust, NANPA notified the Commission and the Industry on June 15, 2001 that NPA relief needed to be addressed. The Industry met on August 23, 2001, in Springfield, Illinois, to discuss various relief alternatives.⁶ Pursuant to the NPA Relief Planning Guidelines, NANPA distributed an Initial Planning Document ("IPD") to the Industry prior to the relief planning meeting. The IPD contained descriptions, maps, general

⁴ In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (INC 97-0404-016, Nov. 13, 2000) ("NPA Relief Planning Guidelines"). The NPA Relief Planning Guidelines assist NANPA, the Industry and Regulatory Authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS web site located at <http://www.atis.org/atis/clc/inc/incdocs.htm>.

⁵ 2001 NRUF and NPA Exhaust Analysis June 1, 2001 Update ("2001 NRUF Report"). The 2001 NRUF Report can be accessed on the NANPA web site at <http://www.nanpa.com>.

⁶ A copy of the August 23 meeting minutes, including a list of attendees, is attached as Exhibit A.

facts and assumptions, and the projected lives of three geographic split alternatives and one all-services distributed overlay relief alternative.⁷ During the meeting, the industry participants created five new split alternatives by modifying three of the geographic split alternatives set forth in the IPD and referred to the new alternatives as Alternatives #1A, #2A, #3A, #3B, and #3C.

More specifically, the Industry participants considered the following alternatives:

- Alternative #1 – Geographic Split: The split boundary line runs in a diagonal direction creating a northwestern NPA, referred to as “Area A” in the IPD and a southeastern NPA, referred to as “Area B.” The Clinton, Decatur, Lincoln, Mattoon, Quincy and Springfield rate centers are included in Area A. The rate centers of Champaign-Urbana, Charleston, Danville and Jacksonville are included in Area B. Area A would have a projected NPA life of 11 years to exhaust and Area B would have a projected NPA life of 13 years to exhaust.
- Alternative #2 – Geographic Split: The split boundary line creates a north central NPA, referred to as “Area A,” surrounded to the east, south and west by a second NPA, referred to as “Area B.” The Charleston, Decatur, Jacksonville Lincoln, Mattoon, Taylorville and Springfield rate centers are included in Area A. The rate centers of Champaign-Urbana, Danville and Quincy are included in Area B. Area A would have a projected NPA life of 13 years to exhaust and Area B would have a projected NPA life of 11 years.
- Alternative #3 – Geographic Split: The split boundary line runs in a north to south direction creating a western NPA, referred to as “Area A” and an eastern NPA, referred to as “Area B.” The, Decatur, Lincoln, Jacksonville, Quincy and Springfield rate centers are included in Area A. The rate centers of Champaign-Urbana, Charleston, Danville and Mattoon are

⁷ A copy of the IPD is attached as Attachment 2 to Exhibit A.

included in Area B. Area A would have a projected NPA life of 12 years to exhaust and Area B would have a projected NPA life of 12 years to exhaust.

- Alternative #4 – All Services Distributed Overlay: A new NPA code would be assigned to the same geographic area as the existing 217 NPA. Alternative #4 has a projected life of 12 years.
- Alternative #1A – Geographic Split: Alternative #1A is a modified version of Alternative #1. The split boundary line of Alternative #1 is moved to include the Kirkland rate center in Area B. Area A would have a projected NPA life of 11 years to exhaust and Area B would have a projected NPA life of 13 years to exhaust.
- Alternative #2A – Geographic Split: Alternative #2A is a modified version of Alternative #2. The split boundary line of Alternative #2 is moved to include the Kirkland rate center in Area B. Area A would have a projected NPA life of 13 years to exhaust and Area B would have a projected NPA life of 11 years to exhaust.
- Alternative #3A – Geographic Split: Alternative #3A is based upon Alternative #3. The split boundary line of Alternative #3 is moved eastward to relocate 38 rate centers from Area B into Area A. Area A would have a projected NPA life of 9 years to exhaust and Area B would have a projected NPA life of 15 years.
- Alternative #3B – Geographic Split: Alternative #3B is a modified version of Alternative #3. The split boundary line of Alternative #3 is moved eastward to relocate 12 rate centers from Area B into Area A. Area A would have a projected NPA life of 11 years to exhaust and Area B would have a projected NPA life of 12 years.
- Alternative #3C – Geographic Split: Alternative #3C is based upon Alternative #3. The split boundary line of Alternative #3 is moved eastward to relocate 29 rate centers from Area B

into Area A. Area A would have a projected NPA life of 9 years to exhaust and Area B would have a projected NPA life of 15 years.

At the August 23 meeting, the participants discussed the attributes of the relief alternatives and reached consensus to recommend to the Commission Alternative #4, the all-services distributed overlay plan, as their first choice for relief for the 217 NPA.⁸ As their second choice, the Industry participants recommended Alternative #3B, a geographic split. The Industry chose Alternative #4, the overlay, as its preferred method of relief because the implementation would be the least disruptive to customers. No existing customers would have to change their telephone numbers and no communities of interest would be split by a new NPA boundary. Because no end users need to change their telephone numbers, wireless customers will not need to have their handsets individually reprogrammed to accept the new NPA. Customers would not have to incur the costs of changing stationery, business cards and advertising. The Industry also noted that the implementation of an overlay is a more efficient use of numbering resources because all of the numbers can be used throughout the entire area. In the case of a split, the numbering resources are concentrated in a small area and if one side of the split exhausts earlier than the other side, the side that exhausts would be unable to take advantage of the remaining numbering resources from the other side. Additionally, the implementation of a split can cause customer confusion as to the location of the new NPA boundaries. In the alternative, the Industry chose the split Alternative #3B as it's second choice because it is the least disruptive to customers as compared to the other split alternatives. It does not divide as

⁸ See Attachment #2 to Exhibit A for a list of Industry agreed upon attributes of geographic splits and overlays.

many EAS calling areas, tandem serving areas or identifiable communities of interest as the other proposed split alternatives.

II. DESCRIPTION OF THE RECOMMENDED RELIEF PLANS

Alternative #4, the all-services distributed overlay, would superimpose a new NPA over the same geographic area covered by the existing 217 NPA. All existing customers would retain the 217 area code and would not have to change their telephone numbers. Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the 217 NPA and the new NPA.⁹ When the 217 NPA exhausts, all CO code assignments will be made from the new overlay area code.

Alternative #3B, a geographic split, would split the 217 NPA into two NPAs with the dividing boundary line running north to south through the midsection of the 217 NPA. A geographic split requires customers located within the area receiving the new area code to change their telephone numbers.

Industry participants reached consensus to recommend to the Commission a 19-month schedule for implementation of the overlay and a 21-month schedule for implementation of the recommended split plan. The recommended schedules are as follows:

Recommended Implementation Schedule for All Services Distributed Overlay

EVENT	TIMEFRAME
Total Interval	19 months
Network Preparation Period	12 months
Permissive 10-Digit Dialing and Customer Education Period (Calls within 217 NPA can be dialed using 7 or 10 digits) Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
First Code Activation (Effective date for codes from the new NPA)	1 month (after Mandatory Dialing Period)

⁹ 47 C.F.R. §52.19(c)(3)(ii).

Recommended Implementation Schedule for Geographic Split

EVENT	TIMEFRAME
Total Interval	21 months
Network Preparation period	12 months
Permissive Dialing and Customer Education Period for <u>Wireline</u> carriers (Calls to the new NPA can be dialed using old or new NPA) Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
Permissive Dialing and Customer Education Period for <u>Wireless</u> carriers (Calls to the new NPA can be dialed using old or new NPA) Mandatory dialing period begins at the end of the Permissive Dialing Period	24 months
First Code Activation (Effective date for codes from the new NPA)	3 month (after Mandatory Dialing Period)

Adhering to the proposed timeframes will avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes.

III. CONCLUSION

The Industry has determined the need to initiate relief efforts for the 217 NPA in Illinois to prevent the exhaust of numbering resources. The Industry respectfully requests that the Commission issue an order approving either the Industry's first choice for relief for the 217 NPA, an all services distributed overlay or the Industry's second choice, a geographic split. The

Industry also requests that the order approve the Industry recommended relief implementation schedules relevant to the type of relief chosen by the Commission.

Respectfully submitted,


Kimberly Wheeler Miller

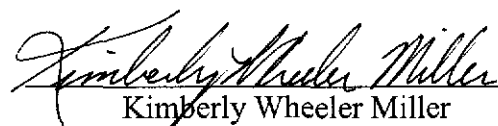
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October 18, 2001

VERIFICATION

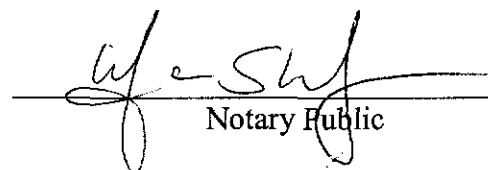
I, Kimberly Wheeler Miller, first being duly sworn upon oath depose and say that I am counsel for NeuStar, Inc.; that I have read the above and forgoing petition by me subscribed and know the contents thereof; that said contents are true to the best of my information and belief.


Kimberly Wheeler Miller

District of Columbia
City of Washington

Sworn and subscribed to before me this 18th day of October 2001.

WITNESS my hand and official seal.


Notary Public

My commission expires on:

Aref A. Sharrofna
Notary Public, District of Columbia
My Commission Expires April 14, 2004